

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

## **JOINT CLAIM CONSTRUCTION STATEMENT**

Plaintiff Zoho Corporation, Third-Party Defendant Zoho Corporation Pvt., Ltd., and Defendant and Counter-Claimant Liberty Peak Ventures, LLC jointly submit this Joint Claim Construction Statement for disputed claim terms of three patents that Liberty Peak Ventures asserts Zoho infringes: (1) U.S. Patent No. 9,373,122 (“122 patent”); (2) U.S. Patent No. 10,074,088 (“088 patent”); and (3) U.S. Patent No. 10,956,901 (“901 patent”).

## I. AGREED CONSTRUCTIONS

| Term  | Agreed Construction   |
|---|---|
| <b>“web service”</b><br>’122 Claims 1, 2, 5, 6, 15, 16<br>’901 Claims 1, 11, 16, 17<br>’088 Claims 1, 15, 19, 20<br><br>This term was proposed by Zoho.                                 | “one or more software components, hardware components, or any combination thereof, associated with providing, receiving, and/or interfacing with data over a network” |
| <b>“browser toolbar”</b><br>’122 Claims 1-3, 6, 7, 15, 16<br>’901 Claims 1, 8, 9, 11, 16, 18, 19<br>’088 Claims 1, 5, 6, 15, 20<br><br>This term was jointly proposed for construction. | “a software program that adds functionality to a browser and includes a graphical user interface component within the browser”  |

## II. DISPUTED CLAIM TERMS

| Term   | LPV Construction                                       | Zoho Construction  |
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| <b>“account information”</b><br>’122 Claims 1, 3, 6, 15<br>’901 Claims 1, 4, 8, 9, 11, 14, 16, 18, 19<br>’088 Claims 1, 5, 15, 20<br><br>This term was proposed by Zoho. | Plain and ordinary meaning – no need for construction. | “information from an account (e.g., an account number) wherein the account is associated with an open account or closed account system”<br><br>“an open account system is one that enables transactions with different merchants. Credit |

| <b>Term</b>   | <b>LPV Construction</b>   | <b>Zoho Construction</b>  |
|---|---|---|
|   |   | cards such as Visa and American Express are examples of open accounts. Closed accounts, by contrast, may be restricted to use with a particular store/merchant, a particular chain of stores/merchants or a collection of affiliated stores/merchants.” |
| <b>“encryption key”</b><br>’122 Claims 1, 7, 15<br><br>This term was proposed by Zoho.  | Plain and ordinary meaning – no need for construction.  | “a private key that corresponds to a public key”  |
| <b>“cryptographic key”</b><br>’901 Claims 1, 4, 11, 14<br>’088 Claims 1, 15<br><br>This term was proposed by Zoho.  | Plain and ordinary meaning – no need for construction.  | “a private key that corresponds to a public key”  |
| <b>“securely storing the account information at the browser toolbar”</b><br>’122 Claim 1<br><br>This term was proposed by Zoho.   | Plain and ordinary meaning – no need for construction, or in the alternative:<br><br>“storing the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar”                          | Indefinite, or in the alternative:<br><br>“storing the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”   |
| <b>“securely storing, by the browser toolbar, the account information at the browser toolbar”</b><br>’901 Claims 1, 11<br>’088 Claim 1<br><br>This term was proposed by Zoho. | Plain and ordinary meaning – no need for construction, or in the alternative:<br><br>“storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is securely accessible by the browser toolbar” | Indefinite, or in the alternative:<br><br>“storing, by the browser toolbar, the account information in a data storage implementation wherein the stored account information is accessible only by the browser toolbar”                                  |

| <b>Term</b>   | <b>LPV Construction</b>                                | <b>Zoho Construction</b> |
|---|--|--------------------------|
| <b>“generating, via the browser toolbar”</b><br>’122 Claim 7<br><br>This term was proposed by Zoho.   | Plain and ordinary meaning – no need for construction. | Indefinite               |
| <b>“generating, at a browser toolbar”</b><br>’901 Claims 1, 11<br>’088 Claim 1<br><br>This term was proposed by Zoho.                                 | Plain and ordinary meaning – no need for construction. | Indefinite               |
| <b>“determining, at a browser toolbar”</b><br>’122 Claim 15<br>’088 Claim 15<br><br>This term was proposed by Zoho.                                   | Plain and ordinary meaning – no need for construction. | Indefinite               |
| <b>“decrypting, at the browser toolbar”</b><br>’122 Claim 15<br><br>This term was proposed by Zoho.   | Plain and ordinary meaning – no need for construction. | Indefinite               |
| <b>“providing, via the browser toolbar, the stored account information to the web service”</b><br>’122 Claim 6<br><br>This term was proposed by Zoho. | Plain and ordinary meaning – no need for construction. | Indefinite               |

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Dated: June 30, 2023

/s/ Matthew C. Acosta

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing is being served on the counsel of record via the CM/ECF system on June 30, 2023.

By: /s/ Phillip J. Haack  
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